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June 10, 2020

**Filed on ECF**

Hon. Alvin K. Hellerstein  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

Re: United States v. George Guldi, et al.,  
19 Cr. 126 (AKH)

Dear Judge Hellerstein:

We represent defendant Victoria Davidson in the above-captioned matter, which is scheduled to proceed to trial on November 16, 2020. We write to inform the Court of Ms. Davidson's inability to pay our outstanding or future legal fees. Because Ms. Davidson wishes that I continue to serve as her counsel for trial, we respectfully request that the Court appoint me to represent her under the Criminal Justice Act ("CJA"). In support of this request, I have enclosed Ms. Davidson's executed financial affidavit, which shows that Ms. Davidson does not have the means to pay for counsel.

For the Court's information, I was an Assistant United States Attorney in the Southern District of New York from 1994 through 2006, I previously served on the CJA Panel in the Southern District of New York, from 2010 through 2013, and I am a Fellow of the American College of Trial Lawyers.

Should the Court grant Ms. Davidson's request to have me appointed as CJA counsel, I would be assisted at trial both by my colleague Daniel Davidson, who most recently was an Assistant District Attorney in Kings County, and by a paralegal from my Firm.

I have spoken with Assistant United States Attorney Danielle Kudla, and it is my understanding that the government takes no position on this matter. We thank the Court for considering this request.

Respectfully,

*Sharon L. McCarthy*  
Sharon L. McCarthy

Enclosure

cc: AUSA Danielle Kudla

*So Ordered.  
The Chief Judge approves this  
appointment for good cause and  
shown and in the interest of  
justice.*  
*Alvin K. Hellerstein*  
*6-30-2020*